

SLR:LDM:CSK  
F. #2016R02185

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
-----X

UNITED STATES OF AMERICA,

— against —

DONVILLE INNISS,

Defendant.  
-----X

**STIPULATION AND WAIVER  
OF FORFEITURE JURY TRIAL**

18-CR-134 (S-2) (KAM)

Pursuant to Rules 23(a) and 32.2(b)(5)(A), of the Federal Rules of Criminal Procedure, the United States of America (the “government”) and the defendant DONVILLE INNISS (the “defendant”) hereby agree to the following:

1. The defendant voluntarily, freely, and without any mental reservation, waives any and all rights that he may have under the laws of the United States or the Constitution of the United States to a jury trial on the Criminal Forfeiture Allegation charged in the above-captioned superseding indictment (the “Superseding Indictment”).
2. The government and the defendant agree that following the guilt phase of the criminal trial and only after the defendant’s conviction of the offenses charged in the Superseding Indictment, the forfeitability of any assets of the convicted defendant shall be determined by the United States District Judge.
3. This waiver is binding on the defendant, and the defendant will not raise any defenses, file an appeal, or otherwise challenge any conviction, sentence or forfeiture imposed by the Court as concerning any right that he may have to a jury trial on the Criminal Forfeiture Allegation charged in the Superseding Indictment.

4. No promises, agreements or conditions have been entered into by the parties concerning any right the defendant may have to a jury trial on the Criminal Forfeiture Allegation other than those set forth in this agreement, and none will be entered into unless memorialized in writing and signed by all parties hereto.

5. To become effective, this waiver must be signed by all signatories and approved by the Court.

Dated: Brooklyn, New York  
1/3, 2020

Respectfully submitted,

RICHARD P. DONOGHUE  
 United States Attorney

By: Sylvia S. Shweder  
 Sylvia S. Shweder  
 Assistant United States Attorney

AGREED AND CONSENTED TO:

Dated: Brooklyn, New York  
1/3, 2020

Donville Inniss  
 DONVILLE INNIS  
 Defendant

Dated: Brooklyn, New York  
1/3, 2020

Anthony L. Ricco  
 ANTHONY L. RICCO, ESQ.  
 Counsel to Defendant Donville Inniss

SO ORDERED AND APPROVED:

Dated: Brooklyn, New York  
Jan 3, 2020

HONORABLE KIYO A. MATSUMOTO  
 UNITED STATES DISTRICT JUDGE  
 EASTERN DISTRICT OF NEW YORK

*United States v. Donville Inniss*, 18-CR-134 (S-2) (KAM)  
 Stipulation and Waiver of Forfeiture Jury Trial